

RILEY A. CLAYTON
Nevada Bar No. 005260
rclayton@lawhjc.com

HALL JAFFE & CLAYTON, LLP
7425 Peak Dr.
Las Vegas, Nevada 89128
Telephone: (702) 316-4111
Facsimile: (702)316-4114

MICHAEL K. FARRELL (*pro hac vice forthcoming*)
mfarrell@bakerlaw.com

BAKER & HOSTETLER, LLP
Key Tower
127 Public Square, Suite 2000
Cleveland, OH 44114
Telephone: 216-621-0200
Facsimile: 216-696-0740

TIFFANY L. POWERS (*pro hac vice forthcoming*)
tiffany.powers@alston.com

ALSTON & BIRD LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309
Telephone: 404.881.7000
Facsimile: 404.881.7777

Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CAMILLE FAGAN,

Plaintiff,

vs.

LIBERTY MUTUAL GROUP, INC., LM
GENERAL INSURANCE, LM INSURANCE
CORPORATION, LM PROPERTY & CASUALTY
INSURANCE COMPANY, and DOES 1 through
10,
Defendants.

CASE NO.: 2:21-cv-00616-APG-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT AND
ADOPTION OF BRIEFING
SCHEDULE (First Request)**

Pursuant to Rule IA 6-1 of the Local Rules of Practice for the United States District Court,
District of Nevada, Plaintiff, Camille Fagan ("Plaintiff"), and Defendants, Liberty Mutual Group,

1 Inc., LM General Insurance, LM Insurance Corporation, and LM Property & Casualty Insurance
2 Company (“Defendants”), by and through their attorneys stipulate and agree as follows:

3 WHEREAS, Plaintiff filed this action in the Eighth Judicial District Court, Clark County,
4 Nevada, on February 23, 2021;

5 WHEREAS, Defendants removed this action from state court to the United States District
6 Court, District of Nevada, on April 14, 2021;

7 WHEREAS, Defendants’ responsive pleading is due on April 23, 2021 pursuant to Fed.
8 R. Civ. P. 81(c)(2)(A);

9
10 WHEREAS, Defendants intend to file a Motion to Dismiss the Complaint (“Motion to
11 Dismiss”), and in order to give the parties additional time to meet and confer regarding
12 Defendants’ proposed pleading, and given the complexity of the issues, the parties seek a mutual
13 extension of the briefing schedule on Defendants’ Motion to Dismiss;

14
15 WHEREAS, the proposed modifications to the briefing schedule will not prejudice any
16 party to this action, and are not being sought for purposes of unnecessarily delaying these
17 proceedings; and

18 WHEREAS, this is the first stipulation for an extension of time in this case.

19 The parties herein stipulate and agree that this Court may enter an Order allowing the
20 briefing on Defendants’ Motion to Dismiss pursuant to the foregoing briefing schedule:

21 1. Defendants’ Motion to Dismiss would be due on or before May 21, 2021;

22 2. Plaintiffs’ Opposition/Response to Defendants’ Motion to Dismiss would be due
23 on or before June 21, 2021;

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3. Defendants' Reply in Support of their Motion to Dismiss would be due on or
before July 19, 2021.

Dated this 21st day of April, 2021.

Dated this 21st day of April, 2021.

HALL JAFFE & CLAYTON, LLP

MATTHEW L. SHARP, LTD.

/s/ Riley A. Clayton

/s/ Matthew L. Sharp

RILEY A. CLAYTON
Nevada Bar No. 5260
7425 Peak Dr.
Lass Vegas, Nevada 89128
Co-counsel for Defendants

MATTHEW L. SHARP
Nevada Bar No. 4746
432 Ridge St.
Reno, Nevada 89501
Co-counsel for Plaintiff

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT COURT JUDGE

DATED: April 22, 2021
CASE NO.: 2:21-cv-00616-APG-NJK